



August 14, 2002

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GROUP 3600

#23 Reg Reason  
& Sub Spec

DE  
8/27/02

Re: Application Number 09/489,739 ✓

Filing Date: January 21, 2000

Sole Applicant/Sole Inventor: David Andrew D'Zmura (pro se independent inventor) ✓

Group Art Unit: 628

Examiner: Mr. Frantzy Poinvil

**Request for Reconsideration of the Restriction Requirement**

Dear Mr. Poinvil:

Whereas my application describes numerous inventions, which serve as basis for independent claims, the unifying and uniting feature is that all of these inventions are, are based upon, or serve to implement, financial valuation technologies and related applications.

To wit, the inventions of Group I are securities valuation technologies, useful to price, analyze and forecast a security or portfolio with respect to yield and to time. The inventions of Group II are innovative securities, termed REPS, which are composed so as to achieve the valuation parameters of a targeted primary security. The inventions of Group III comprise valuation technologies useful for assessing and measuring the default likelihood of insured depository bank institutions. The inventions of Group IV comprise a modified martingale lattice, which is useful to value securities containing elements of default and recovery risks.

Further, the other inventions which I describe and diagram within my application are similarly unified with respect to valuation technologies and related applications. For example, my process transforming data, to ameliorate the influence of inflation and growth, and to transform the data mathematically to revealing distribution, is fundamental to robust valuation based upon historical, statistical and real-time data sets. Further, my small sample technology is useful in data sets containing fewer data points than required by the Law of Large Numbers. My theta modeling technology comprises mathematical programming functions which render useful means for transforming state variables into market valued financial securities. The financial swap transaction comprises a reciprocal netting to balance diverse insurance values. My financial engineering calculator provides means performing above valuation technologies, including, as evident in its drawings, the above coded mathematical programming functions.

Should you decide to reverse and remove the restriction, please examine the claims 5 through 12, presently withdrawn, and/or afford me an opportunity to file further claims herein.

Sincerely,

David Andrew D'Zmura



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**Amendments to the Title, Specification and Drawings**

Dear Mr. Poinvil:

Please allow me to summarize the Amendments which I am effecting to the Title, Specification and Drawings, these based on the substitute specification and replacement drawings which I submitted on 8/9/01 in response to your Office Action mailed as of 2/28/01.

1) As you have pointed out, the Title, "Invention in Finance", is not sufficiently descriptive. Please change the Title to "Valuation Technologies and Related Applications".

2) Based on my substitute specification provided in my Response of 8/9/01, please enter my amendment inserting my specification's Background section and the Abstract.

3) Based on my substitute specification provided in my Response of 8/9/01, please enter my amendment providing the mathematical programming functions pursuant to and disclosed within my Figures 91 and 92 of my replacement drawings submitted 8/9/01. These functions I had provided in the text of my original specification filing in its Section II.

4) Based on my substitute specification provided in my Response of 8/9/01, as well as based on my replacement drawings of 8/9/01, please enter my amendment replacing the Figures 55 through 58, as the underlying data of those drawings has not been presented to date. Please replace those drawings, and references to those drawings in the specification, with the drawings provided herein in the present replacement set, wherein their data are presented.

5) Based on my replacement drawings provided in my Response of 8/9/01, please replace those and enter my amendment providing a replacement set of drawings. This new set of drawings is otherwise identical to the replacement set of 8/9/01, however I have corrected the outstanding informalities of the set of 8/9/01, by using uniform lines, proper margins, etc.

Thank you for entering these amendments.

Sincerely,

David Andrew D'Zmura